

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

RITACCA COSMETIC SURGERY AND)	
MED SPA, Ltd., an Illinois LLC, BLACK)	
ALSATIANS, LLC d/b/a PIGMENT)	
DEMOGRAPHICS AND LASER REMOVAL,)	
a Texas LLC, SAXON HATCHETT, DR. THOMAS))	
BURKE, BURKE DERMATOLOGY, P.A.,)	
DR. ISABEL BANUCHI, BANUCHI INSTITUTE,)	Case No. 15-cv-50148
DR. STEPHEN SNYDER, DERMATOLOGY)	
LASER CENTER & MEDISPA, THE FACIAL)	
SURGERY CENTER, and ALL OTHERS)	Judge Frederick Kapala
SIMILARLY SITUATED,)	
)	Magistrate Judge Iain Johnston
Plaintiffs,)	
)	
v.)	
)	
CYNOSURE, INC., a Delaware Corporation,)	
)	
Defendant.)	

**DEFENDANT’S UNOPPOSED MOTION TO EXTEND THE DEADLINE TO
SUBMIT A PROPOSED CASE MANAGEMENT ORDER**

Defendant, CYNOSURE, INC. (“Defendant”), by and through its attorneys, moves for an order extending the deadline for the parties to submit a proposed case management order in this matter by one week. In support of its motion, Defendant states as follows:

1. On December 21, 2017, this Court entered an order which, among other things, requires the parties to file a proposed case management order by January 9, 2018. [Dkt. # 166].
2. Thereafter, Cynosure decided to transition the defense of this matter to the law firm of Arnold & Porter Kaye Scholer LLP. New counsel (whose appearances are forthcoming) seeks an extra week to become familiar with the case and confer with Plaintiffs’ counsel before committing to a proposed case management order.

3. On January 5, 2018, counsel for Cynosure conferred with counsel for Plaintiffs, who stated no objection to this proposed motion.

4. This motion is not brought for purposes of harassment or delay, and neither party will be prejudiced by the granting of this motion. With the requested extension, the proposed case management order will still be submitted in advance of and will not delay the next case management conference, which is scheduled for January 25, 2018.

WHEREFORE, Defendant Cynosure Inc. respectfully requests that the Court enter an order extending the deadline for the parties to submit a proposed case management order until January 16, 2018.

January 8, 2018

Respectfully submitted,
By: /s/ Eric L. Samore
Counsel for Defendant,
CYNOSURE, INC.
Eric L. Samore ARDC # 6181345
Albert M. Bower ARDC # 6277162
Yesha Hoeppner ARDC #6304109
Ronald Balfour ARDC # 6307658
Kathryn Long ARDC #629936
SmithAmundsen, LLC
150 N. Michigan Avenue, Suite 3300
Chicago, Illinois 60601
(312) 894-3200
esamore@salawus.com

CERTIFICATE OF SERVICE

The undersigned certifies that on January 8, 2018 he served the above Unopposed Motion to Extend the Deadline to Submit a Proposed Case Management Order on all attorneys of record. This pleading was served upon the attorneys as listed above, pursuant to the Northern District of Illinois General Order on Electronic Case Filing.

[x] Pursuant to 28 USC Section 1746(2), I certify under penalty of perjury that the foregoing is true and correct. Executed on: January 8, 2018.

/s/ Eric L. Samore
Eric L. Samore